

IN THE UNITED STATES BANKRUPTCY COURT FOR
THE MIDDLE DISTRICT OF PENNSYLVANIA

In re: }
} Case No. 1-10-04689
Bruce L. Lebitz, and }
Heidi L. Lebitz } Chapter 13
} }
Debtor(s) }

MOTION TO AMEND CHAPTER 13 PLAN AFTER CONFIRMATION

AND NOW, comes the Debtors, Bruce L. and Heidi L. Lebitz, by and through their attorney, Jennifer A. Hoffman, Attorneys at Law, and respectfully represents as follows:

1. This case was commenced on June 4, 2010, when the Debtors filed a voluntary petition under Chapter 13 of the Bankruptcy Code.
2. Your Debtors filed a Third Amended Chapter 13 Plan which was confirmed.
4. Debtors have elected to surrender collateral to the creditor, and therefore needs to amend the plan accordingly.
5. Your Debtors wish to file their Fourth Amended Plan.

WHEREFORE, the Debtors, Bruce L. and Heidi L. Lebitz, respectfully request this Honorable Court to enter an Order of Court allowing them to Amend their Chapter 13 Plan.

Respectfully submitted,

March 1, 2011
DATE

/s/ Jennifer A. Hoffman
Jennifer A. Hoffman, Esquire
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